

ORIGINAL

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UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

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Attorneys for Defendant CAL-WESTERN RECONVEYANCE CORPORATION

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

PAUL DENNIS KALAMA,

Plaintiff,

v.

JP MORGAN CHASE BANK,  
individually and as Trustee fka THE  
CHASE MANHATTAN BANK as  
Trustee; CAL-WESTERN  
RECONVEYANCE CORPORATION;  
and DOES 1-30,

Defendants.

CIVIL NO. CV10-00278-JMS-KSC

**DECLARATION OF DAVID B.  
ROSEN IN SUPPORT OF  
MOTION; EXHIBITS A-F**

**DECLARATION OF DAVID B. ROSEN IN SUPPORT OF MOTION**

I, David B. Rosen, declare as follows:

1. I am an attorney for Defendant CAL-WESTERN RECONVEYANCE CORPORATION (“Cal-Western”) in this action. I have personal knowledge of, and am competent to testify to, the matters set forth below.

2. I make this declaration in support of Cal-Western’s Motion for Summary Judgment based upon my personal knowledge unless otherwise stated.

3. On February 3, 2011, I caused Defendant CAL-WESTERN RECONVEYANCE CORPORATION’s First Request for Production of Documents (“Plaintiff’s Request for Production of Documents”) to be served upon Plaintiff PAUL DENNIS KALAMA’s (“Plaintiff”) attorney in the instant action. A true and correct copy of Plaintiff’s Request for Production of Documents is attached hereto as **Exhibit A**.

4. On March 31, 2011, I attended and participated in the deposition of Plaintiff PAUL DENNIS KALAMA (“Kalama’s Deposition”). A true and correct copy of relevant excerpts from the transcript of Kalama’s Deposition are attached hereto as **Exhibit B**.

5. On May 26, 2011, I attended and participated in the deposition of Plaintiff PAUL DENNIS KALAMA’s cousin, Dustin Dawson (“Mr. Dawson’s

Deposition”). A true and correct copy of relevant excerpts from the transcript of Mr. Dawson’s Deposition are attached hereto as **Exhibit C**.

6. On June 3, 2011, I attended and participated in the deposition of Chelsey Dawson (“Mrs. Dawson’s Deposition”). A true and correct copy of relevant excerpts of the transcript of Mrs. Dawson’s Deposition are attached hereto as **Exhibit D**.

7. Attached hereto as **Exhibit E** is a true and correct electronic copy of the Declaration of Lorrie Womack in Support of Motion for Summary Judgment.

8. Attached hereto as **Exhibit F** is a true and correct electronic copy of the Declaration of Jillian A. Benbow in Support of Motion for Summary Judgment.

I declare under penalty of perjury under the laws of the United States of America and the State of Hawaii that the foregoing is true and correct.

Executed this 31<sup>st</sup> day of August, 2011 at Honolulu, Hawaii.



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DAVID B. ROSEN  
Attorney for Defendant  
CAL-WESTERNRECONVEYANCE  
CORPORATION